

Gentlemen:

I am writing to comment on RM-10564.

By way of introduction, I have been a user of three of the Part-95 radio services: CB, FRS and MURS. CB since 1988, the other two since their inception. I am also an Amateur Radio Operator, General class; my call sign is KC2IDF.

The appearance of the proposal before you is that a party who will benefit monetarily from such action is attempting to force business users off of the personal radio services, starting with FRS. I would surmise that further petitions would follow to remove business users from MURS and CB. The license structure of GMRS already provides an adequate barrier to business that might be interested in using those frequencies.

I offer the following bullet points as to why this is a bad idea:

- In areas where FRS is overly congested, business users of the band may explore alternatives, including LMRS, CB and MURS.
- In areas where FRS is not overly congested, congestion is a moot point.
- Small business owners are constantly in need of effective, low-cost solutions to their problems. If the problem is short-range communications, FRS will provide that solution. To deny this to small business owners will be to force them into solutions that cost many times more than the cost of two FRS HT's.
- Enforcement will be very difficult. The radios are very low-cost, do not require a license, and are easy to operate. Notices will probably not be provided to business users of the band by the manufacturers of the radios in any form that will be readily noticed, as doing so may queer a sale.
- FRS, MURS, and to a lesser extent, CB, have the wonderful property of being able to be deployed quickly. A trip to a retail store will provide all of the needed equipment, there is no installation (except with CB and some MURS equipment), and the equipment can be in operation in minutes. This fills a business need that will be completely blocked in the event that ITA is successful in erecting a "Toll Booth" for business users.

In conclusion, I ask that ITA's proposal be rejected.